

February 8, 2006

Sent by Commercial Overnight Courier

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington D.C. 20554

DOCKET SHEET COPY ATTACHED

Re: Certification of CPNI Filing: EB-06-TC-060; (WC Docket No. 05-196)

0636

Dear Ms. Dortch:

Pursuant to the Enforcement Bureau's Public Notice dated January 30, 2006, (DA 06-223), Americatel Corporation hereby files its compliance certificate and accompanying statement with regard to the Commission's CPNI rules.

Please feel free to contact me with any questions regarding this matter.

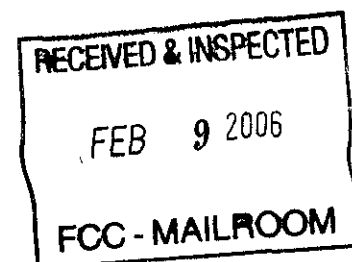
Sincerely,

VICTOR A. LAGO
Vice President for Legal Services and
General Counsel

c.c. Byron McCoy (byron.mccoy@fcc.gov)
Best Copy and Printing (fcc@bcpiweb.com)

No. of Copies *023*
List ABOVE

CERTIFICATION



I, Victor A. Lago, certify that I have personal knowledge that Americatel Corporation has established operating procedures that are adequate to ensure compliance with the FCC's Part 64, Subpart U Rules, 47 CFR 64.2001 to 64.2009, which implements Section 222 of the Communications Act of 1934, as amended, 47 USC Section 222, regarding Customer Proprietary Network Information. A Summary Statement of the Americatel's Policy for the Protection of Customer Proprietary Network Information is attached to this document.

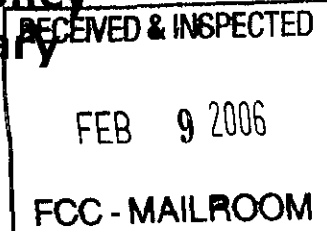
Victor A. Lago
Signature

Vice President for Legal Services and
General Counsel

Title

2/8/06
Date

Summary Statement of the Americatel Policy for the Protection of Customer Proprietary Network Information (CPNI Policy)



A. Policy

The Federal Communications Commission has promulgated rules (codified 47 CFR §64.2001 through §64.2009 – the "CPNI Rules") to restrict the use and protect the confidentiality of Customer Proprietary Network Information ("CPNI"). It is Americatel Corporation's Policy to comply with the CPNI Rules and to protect the confidentiality of CPNI. This policy codifies what have up to now been Americatel's practices and/or what it will do in the future to ensure the confidentiality of CPNI.

B. Definition:

CPNI is information about a customer, including information about the type, configuration or quality of a customer's service; information about a customer's charges or calling activity and information about a customer's name and address, etc. that Americatel obtains in the provision of service to that customer.

C. Use of CPNI

1. Americatel only uses CPNI as follows:

- a. To service the customer's account or service, render bills, collect charges and render customer service; and
- b. To market its long distance services to those customers who already subscribe to one of Americatel's long distance services.

Since the FCC's rules do not require that Americatel obtain prior permission from the customer before using his or her CPNI for the purposes described in this Section C.1, Americatel will not obtain such permission when limiting CPNI to those uses.

2. In the event that Americatel ever decides to use CPNI for any reason other than that noted in C.1 above, Americatel will first implement and train its personnel in the use of the Opt-In and Opt-Out Procedures for obtaining customer consent as set forth in the CPNI Rules. Additionally, if Americatel ever conducts a sales campaign that requires a customer's consent to use CPNI (for example, a sales campaign to market any services other than long distance services),

the senior sales personnel will obtain the approval of the Vice President of Products of any such outbound sales campaign and the said VP of Products will supervise every process in that sales campaign to ensure compliance with the CPNI Rules.

D. Safeguards

1. Training: Americatel has implemented a training program so that its personnel may know when use and/or disclosure of CPNI is permitted. The training program consists of the following:

a. Americatel's senior supervisory personnel are familiar with the CPNI Rules and this CPNI Policy and communicate their requirements to Americatel's sales and customer service employees.

b. Each Americatel employee must sign a confidentiality agreement in which he or she agrees to maintain the confidentiality of Americatel's confidential and proprietary information – including information about Americatel's customers.

c. Americatel's call center personnel are trained in operational procedures to ensure the confidentiality and proper use of CPNI.

2. Disciplinary Action. Employees violating Americatel's CPNI Policies and Procedures are subject to disciplinary action up to and including termination.

3. Operational Procedures. Americatel's operational procedures are designed to ensure the confidentiality of confidential customer information. Such operational procedures include but are not limited to the following:

a.) Americatel's call center personnel are supervised by senior personnel with many years experience in call center operations and procedures. These call center supervisors are, in turn, closely supervised by senior management personnel in Americatel's corporate headquarters.

b.) Americatel limits access to CPNI to properly trained and supervised call center personnel who have agreed to maintain the confidentiality of all Americatel customer information.

c.) Americatel's call center personnel are trained to correctly identify a caller during a customer service call to ensure that CPNI is not inadvertently disclosed to a third party.

4. Record Retention and Supervision of Sales Campaigns Using CPNI: Americatel will maintain records (for minimum of 1 year) of all sales campaigns that use CPNI. The information maintained will be the following: (i.) when the CPNI was disclosed to the call centers, (ii.) the CPNI's that were used in the sales campaign, and (ii) what products or services were offered. Americatel's Vice President of Products will undertake a supervisory review of Americatel's outbound marketing campaigns and processes to ensure and confirm compliance with this CPNI Policy and the CPNI Rules.

5. Independent Contractors: Before disclosing CPNI to an independent contractor (i.e. a telemarketing company or other consultant) Americatel requires the contractor or consultant to sign a confidentiality agreement which imposes upon them the obligations to maintain the confidentiality of all information relating to Americatel's customers (including, by implication, CPNI). Specifically, Americatel has the contractor or consultant contractually agree (i) that it will maintain the confidentiality of any Americatel customer information to which it has access, (ii) that it will use the Americatel customer information for only those purposes for which it has been given access, (iii) that it will not use the Americatel customer information or disclose or allow access to it except as permitted by Americatel or by order of a court of competent jurisdiction and (iv) that it will implement adequate safeguards to ensure the confidentiality of Americatel's confidential information.

6. Certification. An officer, as Americatel's agent, will sign a yearly certification that he has personal knowledge that Americatel's operating procedures are adequate to ensure the confidentiality of CPNI and to ensure Americatel's compliance with the FCC's CPNI Rules.